



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

MAY 15 1989

Ref: 8HWM-RI

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Rockwell International Corporation
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RE: Interim Response Action at
Hillside 881

Gentlemen:

As you know, a meeting to discuss DOE's and Rockwell International's response to EPA's and Colorado Department of Health's (CDH) August 31, 1988, comments on the draft Remedial Investigations/Feasibility Studies (RI/FS) for the Hillside 881 area was held between CDH, EPA, EPA's contractors, and Rockwell International and DOE's contractors, on April 19, 1989. EPA is preparing a response which will deal with further action and decisions made during that meeting, which will be forwarded at a later date.

Information presented in that meeting indicated that DOE and/or Rockwell International were considering a decision which would exclude the Interim Response Action (IRA) at 881 from addressing metals and radionuclide contamination in ground water.

In this letter, EPA and CDH are forwarding a determination on this matter. In order for EPA and CDH to approve any IRA for ground water at the Hillside 881 area, metals and radionuclides must be addressed in addition to the volatile organics.

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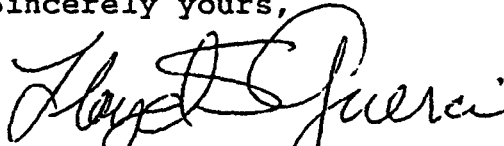
It is EPA's and CDH's understanding that your staffs are developing an initial technical proposal for the IRA and that the initial proposal will not include IRA technology which addresses metals and radionuclides in ground water at the Hillside. We do not intend this determination to interfere with your efforts to submit a technical proposal for discussion purposes as soon as possible. However, metals and radionuclides must be addressed in later drafts.

This determination is being made to help DOE and Rockwell International in focusing overall efforts toward technology design and funding decisions regarding the Hillside 881 area. Enclosed is a document which further justifies and discusses this determination.

EPA and CDH would like to emphasize our position that it is important to proceed with this interim action at Hillside 881 in terms of environmental protection and public health protection. We look forward to working with you and your respective staffs toward initiating and completing the interim action.

If you should have any questions regarding this matter, please contact Nathaniel J. Miullo at (303) 293-1668 or Patricia Corbetta at (303) 331-4843.

Sincerely yours,



Lloyd S. Guerri, Acting Director
Hazardous Waste Management Division



David C. Shelton, Director
Hazardous Materials and Waste
Management Division

Enclosure

cc: Patricia Corbetta, CDH (w/ enclosure)
James Wilson, RFEMC "
Candice Jierree, DOE "
Kirk McKinley, Rockwell Int. "
Terry L. Ruiter, PRC "

HILLSIDE 881 IRA DETERMINATION

DOE and Rockwell International must implement an IRA for the Hillside 881 area which will address radionuclide and metals contamination in ground water.

EPA and CDH concur that this determination is necessary due to the lack of adequate background data which would allow a confident finding of no radionuclide and metals contamination in the ground water and soils at Hillside 881.

Historical data and conclusions reached from analyses of the data, presented by DOE and Rockwell International in the draft 881 RI/FS and response to EPA's and CDH's comments are still in question. Until the site background data is complete and determined to be acceptable, EPA and CDH concur that it is important to pursue remediation of metals and radionuclides that appear to be present in ground water at the site.

When final RI/FS reports are prepared, EPA and CDH will revisit the issue of metals and radionuclides in soils and ground water in regard to a final corrective/remedial actions.

In light of the lack of data for 881 and site-wide background contamination, EPA and CDH are concerned that efforts should be focused on the Hillside 881 rather than other contamination problems at Rocky Flats. EPA and CDH also concur that it may be imprudent at this time to speculate that the treatment system for the Hillside 881 should be scaled up for treatment at other past disposal sites due to the lack of site-wide data.

If DOE and Rockwell International are aware of data which indicates there is sufficient justification for a larger system (such as for clean-up of the solar evaporation surface impoundments and associated contamination), EPA and CDH are willing to discuss the matter of a scaled up multi purpose version of the 881 IRA.

It is likely that uncertainties due to design complexities, lack of quantitative data, and cost concerns may be minimized if DOE and Rockwell International focus efforts solely on the 881 IRA and not on grander schemes for site-wide clean-up. However, if it can be shown that clean-up of the solar evaporation surface impoundment contamination can be adequately and effectively achieved by a larger unit which would service both areas, EPA and CDH would consider the option.